



## U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

July 15, 2022

**By ECF**

The Honorable Katherine Polk Failla  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2103  
New York, New York 10007

**MEMO ENDORSED**

Re: *Melody Business Finance, LLC v. Falcone, et al.*, No. 22-CV-1698 (KPF)

Dear Judge Failla:

This Office represents the United States of America (the “Government”) in the above-referenced action. We write respectfully to request an extension of the deadline for the parties to submit a proposed protective order (and any other discovery agreements) to the Court.

Per its Order dated July 12, 2022, the Court granted an extension of deadline from the date specified in the Civil Case Management Plan and Scheduling Order, Dkt. 20, to today. Dkt. 23. While the parties have made progress discussing potential discovery orders since then, we need additional time to continue those discussions. As such, the Government respectfully requests an additional extension of this deadline from today to August 1, 2022. Plaintiff consents to this request. As stated during the initial pretrial conference held on June 9, 2022, the remaining defendants do not intend to actively participate in discovery, but have agreed to abide by all orders of the Court regarding discovery.

We thank the Court for its consideration of this request.

Respectfully submitted,

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cc: all counsel of record (by ECF)

Application GRANTED. The Clerk of Court is directed to terminate the pending motion at docket number 25. SO ORDERED.

Dated: July 18, 2022  
New York, New York



HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE